

# DePODWIN & MURPHY

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PARALEGAL:  
LYNNE LAUB

October 19, 2007

**Via Fax Transmittal: (914) 390-4179**

Honorable Stephen C. Robinson, U.S.D.J.  
U.S. District Court - Southern District of New York  
United States Courthouse  
300 Quarropas Street - Room 633  
White Plains, NY 10601

## MEMO ENDORSED

Re: Vermont Mutual Insurance Company v. Moslem, *et al.*  
Case No. 07 CIV 7962 (SCR)  
D&M File No.: 11684

Dear Judge Robinson:

This firm, by the undersigned, represents the defendant, Saaed Moslem, in the above referenced matter assigned to Your Honor. This letter constitutes our request for the Court's approval of an extension of time to serve and/or file or move with reference to plaintiff's Complaint to November 14, 2007.

This firm was retained late last week, there have been to the knowledge of the undersigned, no prior requests for any adjournments or extensions (on behalf of our client) and plaintiff's counsel has granted us an extension of time to file an Answer until November 14, 2007.

Plaintiff's counsel has also advised that the Court had directed that the parties prepare a Discovery Plan not later than October 26, 2007. Accordingly, with the consent of plaintiff's counsel, we would respectfully request that the deadline to prepare the Discovery Plan be extended contemporaneously with the date to file an Answer to November 14, 2007.

We appreciate the Court's consideration of this request and submission.

I hereby certify that a copy of this letter has been transmitted to plaintiff's counsel and the attorneys for the co-defendant contemporaneously with its transmission to the Court. Plaintiff's counsel has advised that there has been no appearance by counsel of record for the co-defendant, Country Wide Home Loans.

### APPLICATION GRANTED

Respectfully submitted,

DePODWIN & MURPHY, ESQS.

ANDREW H. DePODWIN  
(#AD 3678)

HON. STEPHEN C. ROBINSON

10/22/07

AHD:dl

cc: (via mail and fax) James W. Borkowski, Esq.  
Saaed Moslem

